

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
<hr/> THIS DOCUMENT RELATES TO: ALL CASES IDENTIFIED IN EXHIBIT A TO UNDERLYING MOTION	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO LIMIT THE OPINIONS
AND TESTIMONY OF DR. SALIL KHANDWALA, M.D.**

Plaintiffs in actions listed on attached Exhibit A, pursuant to Federal Rule of Evidence 702, 403, 104, and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), hereby submit this Motion to Limit the Opinions and Testimony of Salil Khandwala, M.D. Defendant Ethicon has designated Dr. Khandwala, a urogynecologist, to offer opinions on cases involving TVT, TVT-O, and TVT-S. The Court should limit Dr. Khandwala's opinions because he attempts to opine on subjects that exceed the bounds of his qualifications and that are founded on insufficient facts and unreliable methodology. In support of this motion, Plaintiffs have submitted a memorandum of law and also rely upon the following attached exhibits:

1. A list of each case to which this motion applies, identified by case style and number, attached as Exhibit A.
2. A true copy of the General Expert Report (TVT, TVT-O) of Salil Khandwala, M.D., attached as Exhibit B.
3. A true copy of the General Expert Report (TVT-Secur) of Salil Khandwala, M.D., attached as Exhibit C.

4. A true copy of excerpts of the Deposition of Salil Khandwala, M.D., attached as Exhibit D.

As set forth more fully in Plaintiffs' Memorandum in Support of Its Motion, the Court should limit the testimony and opinions of Defendant's expert witness Salil Khandwala, M.D.

Dated: July 21, 2016

LOCKRIDGE GRINDAL NAUEN, P.L.L.P.

By: /s/Yvonne M. Flaherty

Yvonne M. Flaherty

Devona L. Wells

Lockridge Grindal Nauen, P.L.L.P.

100 Washington Avenue South, Suite 2200

Minneapolis, Minnesota 55401

Telephone: (612) 339-6900

ymflaherty@locklaw.com

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2016, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Yvonne M. Flaherty